

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
LANESBOROUGH 2000, LLC,	:	
	:	1:23-cv-07584-PKC
Petitioner/Cross-Respondent,	:	
	:	
-against-	:	
	:	
NEXTRES, LLC,	:	
	:	
Respondent/Cross-Petitioner.	:	
-----X	:	

**PETITIONER'S NOTICE OF OBJECTION TO AND MOTION TO  
QUASH EXEMPTION CLAIM FORM OF DEFENDANT NEXTRES, LLC**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the declaration of John R. Keough, dated May 8, 2025, and all the prior pleadings and proceedings herein, Petitioner Lanesborough 2000, LLC, by and through undersigned counsel, will move this Honorable Court, at 500 Pearl Street, Courtroom 11D, New York, New York, 10007, on a date and time to be determined by the Court, for an order to quash the claim of exemption alleged by Defendant Nextres, as set forth in the accompanying Memorandum of Law, and for such other, further and different relief as the Court deems just in the premises.

Dated: New York, New York  
May 8, 2025

Respectfully submitted,

3. Letter Motion  
at ECF 119 should  
be terminated.

/s/ John R. Keough

John R. Keough  
**CLYDE & CO US LLP**  
The Chrysler Building  
405 Lexington Avenue, 16th Floor  
New York, New York 10174  
Tel.: (212) 710-3900

Daniel R. Lever (Pro Hac Vice Granted, ECF 14)  
**CLYDE & CO US LLP**  
1221 Brickell Avenue, Suite 1600

1. The writ of execution  
and restraining notice  
remain in full force and  
effect ~~per~~ pending further  
order of the Court.

2. Nextres shall respond  
to the motion within the  
time provided in Rule 6.1(b)  
of the local Civil Rules.

SO ORDERED.  
JMM/mtt, USD  
5-13-2025

Miami, Florida 33131  
Tel.: (305) 446-2646

*Attorneys for Petitioner Lanesborough 2000, LLC*